

Department of Environmental Resources

EPA

1575 New Hope Street
Norristown, PA 19401
215 270-1948

July 5, 1989

Mr. Charles Burton
Environmental Engineer
Stanley Flagg and Company, Inc.
1020 West High Street
Stowe, PA 19464

Re: Hazardous Waste Inspection
PA-001737899, May 15, 1989 and June 1, 1989
West Pottsgrove Township, Montgomery County

NOTICE OF VIOLATION

Dear Mr. Burton:

This letter is to confirm the findings of the Department's referenced inspections of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(e)(1)(v), 75.265(h)(1)

During the May 15, 1989 inspection, hazardous waste was observed coming out of the bottoms of both doors of the hazardous waste storage shed.

Waste material from a manhole was observed directly on the ground during the June 1, 1989 inspection. The manhole receives material from the drain located directly outside the bottom door of the hazardous waste storage shed and then directs this material to the onsite treatment facility. Both the drain and the manhole were clogged from an accumulation of waste material.

Facilities should be maintained and operated to minimize the possibility of a discharge of hazardous waste or hazardous waste constituents to the air, soil, surface water, or ground water.

Note: Stanley Flagg should reevaluate their hazardous waste handling practices. A better method of hazardous waste storage should be devised. Stanley Flagg should develop a method of hazardous waste storage using containers pursuant to the container regulations in 75.265(q). The storage shed should be inspected frequently to prevent further releases. A log should be maintained to record the amount of waste being added to the shed and also the amount present in the shed at all times.

Mr. Charles Burton
July 5, 1989

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You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

PEG G. MUSTARD
Waste Management Specialist

cc: Ms. Kurtz
Ms. Roncetti
Division of Compliance & Monitoring
EPA
Re (SNC34)186.6

EPA

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 270-1948

GEN (lg)

February 24, 1989

Mr. S. A. Kovach
Executive Vice President
Stanley Flagg and Company, Inc.
1020 West High Street
Stowe, PA 19466

Re: Hazardous Waste Inspection
PAIX01737899 January 27, 1989
West Pottsgrove Township
Montgomery County

NOTICE OF VIOLATION

Dear Mr. Kovach:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(j) - A signed TSD copy was not on file for Manifest No. 5688421. Please request a copy of this manifest from the TSD facility. Keep a copy on file and send the Department a copy with your response to this letter.

75.262(g)(1)(v) and 75.265(h)(1) - A large accumulation of material of an undetermined nature was noted outside both doors of the hazardous waste storage shed. The hoppers used to transport hazardous waste to the outside storage shed are uncovered and unprotected from wind, rain, overflow, etc.. Facilities should be maintained and operated to minimize the possibility of a discharge of hazardous waste or hazardous waste constituents to air, soil, surface water, or ground water.

Note: Stanley Flagg should reevaluate their waste handling practices. A better method of hazardous waste storage should be devised. Stanley Flagg should develop a method of hazardous waste storage using containers pursuant to the container regulations in 75.265(q).

Please submit to the Department, a plan of waste handling from the point of generation to the point of disposal.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested

Mr. S. A. Kovach
February 24, 1989
- 2 -

to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at (215) 279-1948.

Very truly yours,

NEO M. MUSTARD
Waste Management Specialist

cc: Ms. Kurtz
Ms. Roncetti
EPA
Division of Compliance & Monitoring
Re 30 (SNC22)53.18

EPN

Rec'd 12/14

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 270-1948

November 13, 1987

George Goodman
Stanley Flagg and Company, Inc.
1020 West High Street
Stowe, PA 19464

Re: Hazardous Waste Inspection
PAD001737899, November 3, 1987
West Pottsgrove Township
Montgomery County

NOTICE OF VIOLATION

Dear Mr. Goodman:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(g)(1)(v) and 75.265(h)(1) Hazardous waste storage area had material coming out of the bottom of the new wooden door and out of the side of the building where the fiberglass had pulled away from the support structure, leaving a large opening. Material was also noted outside the entrance of the building, where the material is dumped into the building. Facilities should be maintained and operated to minimize the possibility of a discharge of hazardous waste to air, soil, or water.

A milky yellow liquid was spraying out of the compressor building at the time of inspection. Material was beginning to accumulate on the ground and there is a drainage area which leads to the river in close proximity to the compressor building. It was requested at the time of inspection that this material be cleaned up immediately and prevent it from reoccurring.

It was requested during the time of inspection that the ultimate destination of a drain located at the lower end of the hazardous waste storage area be identified within fourteen days. As of this date, no information has been submitted to the Department regarding the requested information. If plans are not available showing the drainage system, other methods must be used (such as dye testing) to determine where the drain leads.

Please note that a response to the previous Notice of Violation of 8/11/87 was not received by this Department. Please address the items noted in the notice of 8/11/87 as well as those addressed in this notice. A copy of the Notice of Violation of 8/11/87 is enclosed. Please note highlighted areas.

George Goodman
November 13, 1987

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You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1886.

Very truly yours,

CAROL A. QUIGLEY
Waste Management Specialist

cc: Mr. Danyliw
Compliance
Division of Compliance & Monitoring
EPA
Re 30 (4P3)317.2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 270-1879

March 9, 1987

Mr. George Goodman
Vice President
Stanley Flagg and Company, Inc.
1020 West High Street
Stowe, PA 19464

Re: Hazardous Waste Inspection
PAD001737899
West Pottsgrove Inspection/Pottstown
Borough on February 26, 1987

NOTICE OF VIOLATION

Dear Mr. Goodman:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

The operation in the hazardous waste storage area is not in compliance; material (cupola baghouse fines) is missing the storage pit and is being deposited on the asphalt area where the forklifts drive. These fines are very dry and wind is blowing this hazardous material to unpermitted areas.

The operation beneath the sphinxter cone is also not in compliance. Hazardous sludge is falling out of bucket during changing of the buckets and forklifts are driving in it.

Abatement of the above mentioned violations would include shoveling up the hazardous material that misses the storage pit immediately after such an incidence occurs. Also the same procedure should be followed at the sphinxter cone area.

You are hereby notified both of the existence of these violations as well as the need to provide for their prompt attention. You are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Mr. George Goodman
March 9, 1987
- 2 -

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

TERRY E. GOODWALD
Waste Management Specialist

cc: George Danyliw ✓
Nancy Roncetti
Conrad Heinbach (Stanley Flagg)
West Pottsgrove Township
Bureau of Air Quality
Bureau of Water Quality
Re 30 7W63.13

1105

Department of Environmental Resources
1875 New Hope Street
Harrisburg, PA 17101
215 270-1020

February 28, 1985

Mr. Peter Aldred
Environmental Engineer
Stanley Flagg and Company, Inc.
1000 East High Street
State, PA

Re: Hazardous Waste Inspection
of your Facility PAIDEN173789
West Pottersville Township/Pottstown Borough
Montgomery County On January 28, 1985

NOTICE OF VIOLATION

Dear Mr. Aldred:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.261 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

The equalization basin for the incoming waste to the waste treatment plant had only 8 inch freeboard; some of the incoming lines to this basin were blocked up. This appeared to be due to problems with the compressed air in the treatment plant which runs some of the pumps.

The operation in the sludge storage area is very sloppy; material (sludge) is piling up the storage pit and is being deposited on the asphalt area where the forklifts drive.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

CC: - JMK

Mr. Peter Aldred

February 26, 1988

- 2 -

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1234.

Very truly yours,

THOMAS KESNICK

Solid Waste Specialist

cc: G. Dwyll

G. Forner

Division of Landfill Waste

West Potomac Township

Pottstown Borough

Re 30-4852

28804 - 9AM